

KIRTON LAW FIRM

Marlon G. Kirton, Esq.

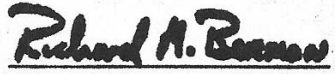
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March 14, 2024

VIA ELECTRONIC FILING

Hon. Richard M. Berman
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007

Re: *United States v. Reyes, 23 cr. 179, (RMB)*

Application granted.	
SO ORDERED: Date: <u>3/15/24</u>	 Richard M. Berman, U.S.D.J.

Dear Judge Berman:

I represent Freddy Ramon Reyes in the matter referenced above. I request an adjournment of the April 8, 2024, trial and trial motion practice unless and until a new trial date is set. I also request that the March 27, 2024 conference be converted to a status conference.

BACKGROUND

Mr. Reyes is a 26-year-old US Citizen and a resident of Los Angeles, California. He is a father, brother, son, and business owner. He has no prior convictions. Apparently, his first and only trip to the Southern District of New York occurred within the time frame of the charged conspiracy. Mr. Reyes is detained without bail at the Metropolitan Detention Center (MDC). Mr. Reyes has a complete copy of his Rule 16 discovery at the MDC, and we have discussed it extensively.

TRIAL

Mr. Reyes does not want to go to trial and risk a sentence of 120 months to Life imprisonment. He has no prior record and wants to be reunited with his family. The parties are negotiating in good faith and expect a disposition later this month. I have discussed this matter with the Government, and the Government consents to my application.

Please contact me if you have any questions or concerns.

Sincerely,

Marlon Kirton
Marlon G. Kirton Esq.

cc: Jane Chong, Assistant United States Attorney (via electronic mail)